

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
:
UNITED STATES OF AMERICA :
: No. 22-CR-240 (AKH)
- v. - :
:
SUNG KOOK (BILL) HWANG and :
PATRICK HALLIGAN, :
:
Defendants. :
:
----- X

**DEFENDANT PATRICK HALLIGAN'S JOINDER TO
DEFENDANT SUNG KOOK (BILL) HWANG'S
MOTION TO EXCLUDE PROPOSED EXPERT TESTIMONY OF
ROBERT BATTALIO, AMIT SERU, CARMEN TAVERAS,
AND JOSEPH MASON**

PLEASE TAKE NOTICE that defendant Patrick Halligan hereby joins in defendant Sung Kook (Bill) Hwang's motion to exclude certain of the anticipated testimony and opinions of the government's proposed experts [ECF No. 105, the "Motion to Exclude"]. Mr. Halligan joins the Motion to Exclude in full, and expressly incorporates, adopts, and relies upon the legal authorities and arguments set forth in Mr. Hwang's supporting memorandum of law [ECF No. 105] as well as the factual matters set forth in the Declaration of Jordan Estes [ECF No. 106].

Mr. Halligan respectfully requests that the Court grant relief to the same and full extent set forth in the Motion to Exclude, including without limitation exclusion of the following anticipated testimony and opinions:

Government's Proposed Expert	Paragraphs of Anticipated Testimony and Opinions that Should Be Excluded
Prof. Robert H. Battalio	4.b, 4.c, 4.d, 5, 6, 6.b, 6.c, 6.d, 6e., 6.f, 6.g, 7, 7.a, 7.b, 7.c, 7.e, 7.f, 7.g, 7.h, and 8
Prof. Amit Seru	3, 5-6, 9-11
Dr. Carmen A. Taveras	4.B, 4.D, 4.J, 5-7, 9, 10
Dr. Joseph R. Mason	3, 5, 7-11

Dated: New York, New York
 December 19, 2023

Respectfully Submitted,

FRIEDMAN KAPLAN SEILER
 ADELMAN & ROBBINS LLP

s/ Mary E. Mulligan
 Mary E. Mulligan (mmulligan@fklaw.com)
 Timothy M. Haggerty (thaggerty@fklaw.com)
 Bonnie M. Baker (bbaker@fklaw.com)
 Anil Vassanji (avassanji@fklaw.com)
 Rupita Chakraborty (rchakraborty@fklaw.com)
 7 Times Square
 New York, New York 10036-6516
 (212) 833-1100

Attorneys for Patrick Halligan